

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE CATTLE AND BEEF ANTITRUST
LITIGATION

Case No. 22-md-3031-JRT-JFD

This Document Relates to:

In re: Cattle and Beef Antitrust Litigation

Case No. 0:22-md-03031-JRT-JFD

*Associated Grocers, Inc., et al v. Cargill Inc.,
et al; Case No. 1:22-cv-02525*

**STIPULATION OF DISMISSAL, WITHOUT PREJUDICE, OF PLAINTIFF
BROOKSHIRE GROCERY COMPANY’S DIRECT ACTION PURCHASER CLAIMS
AND CAUSES OF ACTION AGAINST DEFENDANTS CARGILL, INC., AND
CARGILL MEAT SOLUTIONS CORPORATION**

Pursuant to FED. R. CIV. P. 41(a), Plaintiff Brookshire Grocery Company (“BGC”) and Defendants Cargill, Inc., and Cargill Meat Solutions Corporation (a/k/a Cargill Protein a/k/a Cargill Protein – North America) (together, the “Cargill Defendants”), by and through their undersigned counsel, hereby submit the following Stipulation of Dismissal, Without Prejudice.

1. The Stipulation of Dismissal Without Prejudice (“Stipulation”) is between BGC and the Cargill Defendants only.

2. This Stipulation relates only to the direct action purchaser (“DAP”) claims and causes of action asserted by BGC against the Cargill Defendants in *In re: Cattle and Beef Antitrust Litigation* Case No. 0:22-md-03031-JRT-JFD (MDL 3031) and *Associated Grocers, Inc., et al v. Cargill Inc., et al; Case No. 1:22-cv-02525* (together, the “Actions”), and has no bearing or impact in any way whatsoever on (i) BGC’s DAP claims and causes of action against any Defendant other than the Cargill Defendants in the Actions, and/or (ii) BGC’s right

to participate as an absent class member and share in any recovery in any class action brought against the Cargill Defendants as part and parcel of the Actions.

3. In accordance with FED. R. CIV. P. 41(a)(1)(A)(ii), therefore, BGC and the Cargill Defendants stipulate and agree to the dismissal, without prejudice, of all BGC's DAP claims and causes of action asserted against the Cargill Defendants in the Actions, with each party bearing its own attorneys' fees, litigation expenses, and court costs.

Date: May 7, 2024

Respectfully submitted,

/s/ Richard L. Coffman

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CERTIFICATE OF SERVICE

I hereby certify that on May 7, 2024, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Richard L. Coffman
Richard L. Coffman